

**Baronius Press' Privilege Log**

<b>Bates Stamped Number</b>	<b>Document Date</b>	<b>Type of Document</b>	<b>Person in Possession of the Document</b>	<b>Author of the Document</b>	<b>Reason for Not Producing</b>
n/a	Various	Various memoranda, attorney notes to and from client	Mark Ishman and client	Various	Attorney-client privilege, attorney work product, created in anticipation of litigation or for trial
n/a	Various	Emails regarding case strategy and evaluation and related issues	Mark Ishman and client	Mark Ishman, Thomas Healy and Paul Kejik	Attorney-client privilege, attorney work product, created in anticipation of litigation or for trial
n/a	Various	Timelines created by counsel	Mark Ishman	Mark Ishman and client	Attorney-client privilege, attorney work product, created in anticipation of litigation or for trial
n/a	Various	Emails regarding researching Defendant's acts of infringement and other unlawful activity	Mark Ishman and client	Mark Ishman and Client	Attorney-client privilege, attorney work product, created in anticipation of litigation or for trial

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n/a	Various	Legal research regarding Defendant's acts of infringement and other unlawful activity	Mark Ishman	Mark Ishman	Attorney-client privilege, attorney work product, created in anticipation of litigation or for trial
BP 00852 BP 00979		Agreement	Mark Ishman and client	Client and Mercier Press	Redacted monetary figures from the agreement because the amount client paid for is not relevant to this lawsuit; Rather it's the rights acquired by client is what is relevant.
BP 00853-00858		Agreement	Mark Ishman and client	Client and nova et vetera	Redacted royalty figures from the agreement because the amount is not relevant to this lawsuit; Rather it's the rights acquired by client is what is relevant.

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BP 00809-00812		Correspondence	Mark Ishman, and Client	Client and Mercier Press	Redacted offers of monetary figures from the correspondence because the amount client ultimately paid for <i>Fundamentals</i> is not relevant to this lawsuit; Rather it's the rights acquired by client is what is relevant.
BP 01052 – BP 01054	Various	Settlement Agreement	client	Client	Settlement agreement is protective by a confidentiality agreement, whereby its existence and terms cannot be shared with others who are not a party of the agreement.
BP 00953 – BP 01051	Various	DMCA Notices, Cease and Desist Notices, correspondence	Client	Client and various third parties	Work Product created in anticipation of litigation

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BP 00928		Correspondence	Mark Ishman, and Client	Client	Redacted note about Client – subcontractor relationship
BP 00931		Correspondence	Mark Ishman, and Client	Client	Redacted text about research resource (Trade secret)
BP 00939		Correspondence	Mark Ishman, and Client	Client	Redacted Name and address of client's subcontractor
BP 01055 – BP 01056		Agreement	Mark Ishman and Client	Client	Redacted monetary figures from the agreement because the amount client paid is not relevant to this lawsuit